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17

18 UNITED STATES DISTRICT COURT

19 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

20 CH₂O, INC.,

Case No. CV-13-8418 JAK (GJSx)

21 Plaintiff,

**DECLARATION OF JOANNA M.
FULLER IN SUPPORT OF CH₂O,
INC.'S MOTION FOR ENHANCED
DAMAGES**

22 v.
23 MERAS ENGINEERING, INC.; MERAS
24 ENGINEERING, INC.; HOUWELING'S
NURSERIES OXNARD, INC.; HNL
25 HOLDINGS LTD.; HOUWELING
UTAH OPERATIONS, INC.; and
26 HOUWELING'S NURSERIES LTD.,

Hon. John A. Kronstadt

27 Defendants.

1 I, Joanna M. Fuller, hereby declare and state as follows:

2 1. I am an associate at the law firm of Fish & Richardson P.C. and counsel
3 for Plaintiff CH₂O, Inc. ("CH₂O"). I am admitted to practice before this Court. I have
4 personal knowledge of the facts stated in this declaration and can and would testify
5 truthfully thereto if called upon to do so.

6 2. Attached hereto as Exhibit A is a true and correct copy of excerpts from
7 the consolidated trial transcript (*see, e.g.*, D.I. 469-1).

8 3. Attached hereto as Exhibit B is a true and correct copy of Trial Exh. 1,
9 U.S. Patent No. 6,767,470

10 4. Attached hereto as Exhibit C is a true and correct copy of Trial Exh. 249,
11 Ltr and attachment to Casey Houweling fr Tony McNamara re attorney letter, dated
12 3/7/2013.

13 5. Attached hereto as Exhibit D is a true and correct copy of Trial Exh. 217,
14 Ltr to Casey Houweling fr Andrew Kopsidas, cc: Carl Iverson re draft complaint,
15 dated 7/26/2013.

16 6. Attached hereto as Exhibit E is a true and correct copy of Trial Exh. 252,
17 Ltr and attachments to Chris Binfield fr Andrew Kopsidas, cc: Carl Iverson fwd draft
18 complaint, dated 8/1/2013.

19 7. Attached hereto as Exhibit F is a true and correct copy of an excerpt from
20 Trial Exh. 289, Carl Iverson Demonstratives.

21 8. Attached hereto as Exhibit G is a true and correct copy of excerpt from
22 Trial Exh. 209, Attachment C-9 to Report of DeForest McDuff, Ph.D.

23 I declare under the penalty of perjury of the laws of the United States of
24 America that the foregoing is true and correct. Executed on November 9, 2016 in San
25 Diego, California.

26 /s/ Joanna M. Fuller
27 Joanna M. Fuller

28 DECL. OF FULLER ISO CH₂O's MOTION FOR ENHANCED DAMAGES

1 Case No. CV-13-8418 JAK (GJSx)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 9, 2016 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail and regular mail.

/s/ Joanna M. Fuller
Joanna M. Fuller
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